

Allen Kohn (AK-1622)
ITKOWITZ PLLC
26 Broadway, 21st Floor
New York, New York 10004
(646) 822-1204
akohn@itkowitz.com

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

ROSEMARIE RICHARDSON,

Plaintiff,

Index No. 16-CV-01364 (JPO)

-against-

CARMEN FARINA, KATHERINE G. RODI,
CANDACE R. MCLAREN, MIRIAM M.
BERARDINO, ANNA STEEL, THE NEW YORK
CITY DEPARTMENT OF EDUCATION, THE NEW
YORK CITY BOARD OF EDUCATION AND THE
CITY OF NEW YORK,

Defendants.

-----X

**DECLARATION OF ALLEN KOHN IN OPPOSITION TO DEFENDANT'S
MOTION TO DISMISS**

ALLEN KOHN, an attorney, admitted to the practice of law in this Court, hereby
declares upon penalty of perjury, pursuant to 28 U.S.C. § 1746, as follows:

1. I am an employee at Itkowitz PLLC, attorneys for Plaintiff ROSEMARIE
RICHARDSON ("Richardson").

2. I am familiar with the facts and circumstances of this proceeding involving Richardson and CARMEN FARINA (“Farina”), KATHERINE G. RODI (“Rodi”), CANDACE R. McLAREN (“McLaren”), MIRIAM M. BERARDINO (“Berardino”), ANNA STEEL (“Steel”), THE NEW YORK CITY DEPARTMENT OF EDUCATION (“DOE”), THE NEW YORK CITY BOARD OF EDUCATION (“BOE”) AND THE CITY OF NEW YORK (“NYC”) (collectively “Defendants”).

3. I submit this declaration in opposition to Defendant’s Motion to Dismiss.

4. Upon information and belief, on or about March 2, 2016, “B. Mazyck,” an individual of suitable age and discretion who is employed by the New York City Law Department, accepted a true and accurate copy of the Summons (“Summons”) and Verified Complaint (“Complaint”) in this action on behalf of Farina. Attached as “Exhibit 1” is a copy of the Affidavit of Service.

5. On March 14, 2016 Itkowitz PLLC attempted to mail Rodi, McLaren, Berardino and Steel a copy of the Summons and Complaint at 65 Court Street, Brooklyn New York 11201 (“65 Court Street”). A copy of the envelopes’ mailing labels are attached as Exhibit “2.”

6. UPS informed Itkowitz PLLC that its mailings could not be accepted at 65 Court Street due to a lack of suite number in the address. Attached as Exhibit “3” are the return envelopes from UPS.

7. On March 28, 2016, I had a phone conference with Kevin Connolly (“Connolly”), opposing counsel, and requested the suite numbers for Rodi, McLaren, Berardino and Steel.

8. Connolly informed me that McLaren and Steel ceased their employment with the NYC, BOE and DOE and cannot be served at 65 Court Street.

9. Connolly also refused to disclose McLaren and Steel’s forwarding addresses.

10. Connolly further informed me that Rodi's suite number is the "2nd floor" and Berardino's suite number is "3rd Floor."

11. On April 12, 2016, in a properly addressed envelope, Itkowitz PLLC sent Miriam M. Berardino at 65 Court Street, 3rd Floor, Brooklyn New York 11201 a copy of the Summons and Complaint, a completed AO 398 (Rev. 01/09) Notice of Lawsuit and Request to Waive Service of a Summons, two completed copies of AO 399 (01/09) Waiver of the Service of Summons and a prepaid return envelope. A copy of the envelope's mailing is attached as Exhibit "4."

12. To date, Itkowitz PLLC has not received a response from Berardino.

13. On April 12, 2016, in a properly addressed envelope ("April Envelope"), Itkowitz PLLC sent Katherine G. Rodi at 65 Court Street, 2nd Floor, Brooklyn New York 11201 a copy of the Summons and Complaint, a completed AO 398 (Rev. 01/09) Notice of Lawsuit and Request to Waive Service of a Summons, two completed copies of AO 399 (01/09) Waiver of the Service of Summons along with a prepaid return envelope.

14. Pursuant to FRCP Rule 26(a)(1)(A), on April 12, 2016, I sent an email to Connolly requesting the addresses of McLaren and Steel. A copy of the email is attached as Exhibit "5."

15. Connolly replied "I can accept service on behalf of Ms. McLaren and Ms. Steel." A copy of Connolly's email is attached as Exhibit "6."

16. On April 20, 2016 the April Envelope was returned to Itkowitz PLLC marked "Suite Number Needed." Attached as Exhibit "7" is a copy of the return receipt.

WHEREFORE, Plaintiff respectfully requests that the instant Motion to Dismiss
be denied in all respects.

Dated: New York, New York
June 9, 2016

ITKOWITZ PLLC
Attorneys for Plaintiff

By: /s/
Allen Kohn, Esq. (AK 1622)
26 Broadway, 21st Floor
New York, New York 10004
(646) 822-1204
akohn@itkowitz.com

EXHIBIT 1

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
ROSEMARIE RICHARDSON

Plaintiff,

Index No. 1:16-cv-01364

-against-

AFFIDAVIT OF SERVICE

CARMEN FARINA, KATHERINE G. RODI,
CANDACE R. MCLAREN, MIRIAM M.
BERARDINO, ANNA STEEL, THE NEW YORK CITY
DEPARTMENT OF EDUCATION, THE NEW YORK
CITY BOARD OF EDUCATION AND THE CITY OF
NEW YORK

Defendants.
-----X

STATE OF NEW YORK)
) ss.
COUNTY OF NEW YORK)

The undersigned, being duly sworn, says:

I am not a party to this action, am over 18 years of age and am employed at Itkowitz PLLC, 26 Broadway, 21st Floor, New York, New York 10004.

On March 2, 2016, I served true copies of the annexed Summons and Verified Complaint (hereinafter referred to collectively as "the papers") on Carmen Farina, the New York City Department of Education, and the City of New York as described below.

On March 2, 2016, I delivered the papers to B. Mazyck, a person of suitable age and discretion and an employee of the New York City Law Department, who accepted service at 100 Church Street, New York, New York 10007, on behalf of Carmen Farina, the New York City Department of Education, and the City of New York.



Max Bronfman

Sworn to before me this 4th Day of



NOTARY PUBLIC
61178



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
ROSEMARIE RICHARDSON

Plaintiffs,

Index No. 1:16-cv-01364

-against-

AFFIDAVIT OF SERVICE

CARMEN FARINA, KATHERINE G. RODI,
CANDACE R. MCLAREN, MIRIAM M. BERARDINO,
ANNA STEEL, THE NEW YORK CITY
DEPARTMENT OF EDUCATION, THE NEW YORK
CITY BOARD OF EDUCATION AND THE CITY OF
NEW YORK

Defendants.
-----X


STATE OF NEW YORK)
) ss.
COUNTY OF NEW YORK)

The undersigned, being duly sworn, says:

I am not a party to this action, am over 18 years of age and am employed at Itkowitz PLLC, 26 Broadway, 21st Floor, New York, New York 10004.

On March 7, 2016 I served true copies of the annexed Summons and Complaint (hereinafter referred to collectively as "the papers") on the New York City Board of Education as described below.

On March 7, 2016 I delivered the papers to B. Mazyck, a person of suitable age and discretion and an employee of the New York City Law Department, who accepted service at 100 Church Street, New York, New York 10007, on behalf of the New York City Board of Education.



Sam Smouha

Sworn to before me this 7th Day of March
2016



NOTARY PUBLIC
61172/104329



EXHIBIT 2

1. Ensure there are no other shipping or tracking labels attached to your package. Select the Print button on the print dialog box that appears. Note: If your browser does not support this function select Print from the File menu to print the label.

2. Fold the printed label at the solid line below. Place the label in a UPS Shipping Pouch. If you do not have a pouch, affix the folded label using clear plastic shipping tape over the entire label.

3. GETTING YOUR SHIPMENT TO UPS

Customers with a Daily Pickup

Your driver will pickup your shipment(s) as usual.

Customers without a Daily Pickup

Take your package to any location of The UPS Store®, UPS Access Point™ location, UPS Drop Box, UPS Customer Center, UPS Alliances (Office Depot® or Staples®) or Authorized Shipping Outlet near you. Items sent via UPS Return Services(SM) (including via Ground) are also accepted at Drop Boxes. To find the location nearest you, please visit the 'Find Locations' Quick link at ups.com. Schedule a same day or future day Pickup to have a UPS driver pickup all of your Internet Shipping packages.

Hand the package to any UPS driver in your area.

UPS Access Point™
THE UPS STORE
64 BEAVER ST
NEW YORK, NY 10004
UPS Access Point™
THE UPS STORE
71 BROADWAY
NEW YORK, NY 10006
UPS Access Point™
THE UPS STORE
82 NASSAU ST
NEW YORK, NY 10038

FOLD HERE

MICHELLE MARATTO 212.822.1808 ITKOWITZ PLLC 26 BROADWAY 21ST FLOOR NEW YORK, NY 10004	0.0 LBS LTR 1 OF 1
SHIP TO: CANDACE R. MCLAREN NYC DEPARTMENT OF EDUCATION 65 COURT STREET BROOKLYN NY 11201-4916	
	NY 111 9-50 
UPS NEXT DAY AIR 1 TRACKING #: 1Z 712 123 01 9153 3477	
	
BILLING: P/P	
US 18.0.33 WNTNVS0 72.0A 01/2016 	

1. Ensure there are no other shipping or tracking labels attached to your package. Select the Print button on the print dialog box that appears. Note: If your browser does not support this function select Print from the File menu to print the label.

2. Fold the printed label at the solid line below. Place the label in a UPS Shipping Pouch. If you do not have a pouch, affix the folded label using clear plastic shipping tape over the entire label.

3. GETTING YOUR SHIPMENT TO UPS

Customers with a Daily Pickup

Your driver will pickup your shipment(s) as usual.

Customers without a Daily Pickup

Take your package to any location of The UPS Store®, UPS Access Point™ location, UPS Drop Box, UPS Customer Center, UPS Alliances (Office Depot® or Staples®) or Authorized Shipping Outlet near you. Items sent via UPS Return Services(SM) (including via Ground) are also accepted at Drop Boxes. To find the location nearest you, please visit the 'Find Locations' Quick link at ups.com. Schedule a same day or future day Pickup to have a UPS driver pickup all of your Internet Shipping packages.

Hand the package to any UPS driver in your area.

UPS Access Point™
THE UPS STORE
64 BEAVER ST
NEW YORK, NY 10004
UPS Access Point™
THE UPS STORE
71 BROADWAY
NEW YORK, NY 10006
UPS Access Point™
THE UPS STORE
82 NASSAU ST
NEW YORK, NY 10038

FOLD HERE

MICHELLE MARATTO 212 822 1808 ITKOWITZ PLLC 26 BROADWAY 21ST FLOOR NEW YORK NY 10004	0.0 LBS LTR	1 OF 1
SHIP TO: ANNA STEEL NYC DEPARTMENT OF EDUCATION 65 COURT STREET BROOKLYN NY 11201-4916		
	NY 111 9-50 	
UPS NEXT DAY AIR 1		
TRACKING #: 1Z 712 123 01 9184 0493		
		
BILLING: P/P		
US 18 0.33 WNTNVS0 72.04 01/2016 		

UPS Internet Shipping: View/Print Label

1. Ensure there are no other shipping or tracking labels attached to your package. Select the Print button on the print dialog box that appears. Note: If your browser does not support this function select Print from the File menu to print the label.

2. Fold the printed label at the solid line below. Place the label in a UPS Shipping Pouch. If you do not have a pouch, affix the folded label using clear plastic shipping tape over the entire label.

3. GETTING YOUR SHIPMENT TO UPS

Customers with a Daily Pickup

Your driver will pickup your shipment(s) as usual.

Customers without a Daily Pickup

Take your package to any location of The UPS Store®, UPS Access Point(TM) location, UPS Drop Box, UPS Customer Center, UPS Alliances (Office Depot® or Staples®) or Authorized Shipping Outlet near you. Items sent via UPS Return Services(SM) (including via Ground) are also accepted at Drop Boxes. To find the location nearest you, please visit the 'Find Locations' Quick link at ups.com. Schedule a same day or future day Pickup to have a UPS driver pickup all of your Internet Shipping packages.

Hand the package to any UPS driver in your area.

UPS Access Point™

THE UPS STORE

64 BEAVER ST

NEW YORK, NY 10004

UPS Access Point™

THE UPS STORE

71 BROADWAY

NEW YORK, NY 10006

UPS Access Point™

THE UPS STORE

82 NASSAU ST

NEW YORK, NY 10038

FOLD HERE

MICHELLE MARATTO 212 822 1808 ITKOWITZ PLLC 26 BROADWAY 21ST FLOOR NEW YORK, NY 10004	0.0 LBS LTR 1 OF 1
SHIP TO: MIRIAM M. BERARDINO NYC DEPARTMENT OF EDUCATION 65 COURT STREET BROOKLYN NY 11201-4916	
	NY 111 9-50 
UPS NEXT DAY AIR 1 TRACKING #: 1Z 712 123 01 9372 4687	
	
BILLING: P/P	
UPS 18.0.33. WNTNVS0 72.04.01/2016 	

1. **Ensure there are no other shipping or tracking labels attached to your package.** Select the Print button on the print dialog box that appears. Note: If your browser does not support this function select Print from the File menu to print the label.

2. **Fold the printed label at the solid line below.** Place the label in a UPS Shipping Pouch. If you do not have a pouch, affix the folded label using clear plastic shipping tape over the entire label.

3. **GETTING YOUR SHIPMENT TO UPS**

Customers with a Daily Pickup

Your driver will pickup your shipment(s) as usual.

Customers without a Daily Pickup

Take your package to any location of The UPS Store®, UPS Access Point™ location, UPS Drop Box, UPS Customer Center, UPS Alliances (Office Depot® or Staples®) or Authorized Shipping Outlet near you. Items sent via UPS Return Services(SM) (including via Ground) are also accepted at Drop Boxes. To find the location nearest you, please visit the 'Find Locations' Quick link at ups.com. Schedule a same day or future day Pickup to have a UPS driver pickup all of your Internet Shipping packages.

Hand the package to any UPS driver in your area.

UPS Access Point™

THE UPS STORE

64 BEAVER ST

NEW YORK, NY 10004

NEW YORK, NY 10006

UPS Access Point™

THE UPS STORE

71 BROADWAY

NEW YORK, NY 10038

UPS Access Point™

THE UPS STORE

82 NASSAU ST

FOLD HERE

MICHELLE MARATTO 2128221808 ITKOWITZ PLLC 26 BROADWAY 21ST FLOOR NEW YORK, NY 10004	0.0 LBS LTR 1 OF 1
SHIP TO: KATHERINE G. RODI 65 COURT STREET BROOKLYN NY 11201-4916	
	NY 111 9-50 
UPS NEXT DAY AIR 1 TRACKING #: 1Z 712 123 01 9163 0862	
	
BILLING: P/P	
US 18 0.33. WNTNVS0 72.0A 01/2016 	

EXHIBIT 3

Extremely Urgent

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UPS Worldwide Express®
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Domestic Shipments

- To qualify for the letter rate, UPS Express Envelope correspondence, urgent documents, must weigh 8 oz. or less. UPS, those listed or weighing

International Shipments

- The UPS Express Envelope value. Certain countries: ups.com/importexport
- To qualify for the letter UPS Express Envelopes

Note: Express Envelopes containing sensitive personal or cash equivalent.

22/Mar/2016 11:34 1120-P019-8433

Window Envelope

Use this envelope with ship or inkjet printer on plain paper

RETURN TO:
ITKOWITZ PLLC
2120221008
26 BROADWAY
FL 21
NEW YORK NY 10004 1700

NY 102 9-09



127121231291533474

22/Mar/2016 11:34 1120-P019-8433

RETURN TO SHIPPER
REASON FOR RETURN:
SUITE NUMBER NEEDED, NOT DELIVERED
ORIGINAL RECEIVER:
CANDACE R. MCLAREN

NY 102 9-09



127121231291533474

UPS 3 DAY SELECT
TRACKING #: 12 712 123 12 9153 3474



BIL LVH3NPL NYMS209 US 1120 Mar 22 11:34:19 2016 HIP 16.3.5 LP2844

61172

UIS 18.0.33 WNTTV50 72.0A 01/2016



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United Parcel Service.



100% Recycled fiber
80% Post-Consumer

International Shipping Notice - Carriage hereunder may be subject to the rules relating to international carriage of goods by air (the "Warsaw Convention") and/or the Convention on the Contract for the International Carriage of Goods by Road (the "CMR Convention"). These commodities, technology or software were exported from the U.S. in accordance with the Export Administration Regulations. Diversion contrary to U.S. law prohibited.

International Shipping Notice – Carriage between may be subject to the rules relating to liability and other terms and/or conditions established by the Convention for the Unification of Certain Rules Relating to International Carriage by Air (the "Warsaw Convention") and/or the Convention on the Liability for the International Carriage of Goods by Road (the "CMR Convention"). These conventions, in addition to software, were sourced from the U.S. in accordance with the Export Administration Regulations; therefore, contrary to U.S. law prohibitions.

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United Parcel Service.**



UPS Next Day Air®
UPS WorldWide Express®
UPS 2nd Day Air®

Insert shipping documents under window from the top

3



BILL

LVHJNPW NYMA5209 US 1120 Mar 22 11:34:44 2016 HIP 16.3.5 LP2044

UJS 18.0.33. WNTINVS0 72 0A 01/2016



elope for:

ipedited

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UPS Worldwide Express®
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ups.com® or call 1-800-PICK-UPS® (1-800-742-5877)
to schedule a pickup or find a drop off location near you.

International Shipments

Qualify for the Letter Mail
service, urgent
to 8 oz. or less. UPS
is listed or weighing

International Shipments

UPS Express Envelope
to: Certain countries cc
om/importexport to

Qualify for the Letter rate
Express Envelopes weigh

Express Envelopes are for
transporting sensitive personal
information.

Window Envelope

Use this envelope with a
inkjet printer on plain

nts
top.

RETURN TO:
ITKOWITZ PLLC
2128221808
26 BROADWAY
FL 21
NEW YORK NY 10004 1700

22/Mar/2016 11:35 1120-P019-8431

1 OF 1



NY 102 9-09



127121231291840490

RETURN TO SHIPPER
REASON FOR RETURN:
SUITE NUMBER NEEDED, NOT DELIVERED
ORIGINAL RECEIVER:
ANNA STEEL

22/Mar/2016 11:35 1120-P019-8431



NY 102 9-09



127121231291840490

UPS 3 DAY SELECT

TRACKING #: 12 712 123 12 9184 0490



LVW3NPH NYMAS289 US 1120 Mar 22 11:35:10 2016 HIP 16.3.5 LP2844

UPS 18.0.33.

WNTNV50 72.0A 01/2016



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Visit **ups.com**® or call 1-800-4USPS to schedule a pickup or fir

Domestic Shipments

UPS® will not accept mail that does not qualify for the Letter rate, UPS® First-Class® Mail®, or Priority Mail®. For correspondence, urgent documents, or parcels weighing 8 oz. or less, UPS® Express Mail® is the best choice. For parcels weighing more than 8 oz., use the appropriate service.

International Shipments

UPS® Express Mail® International® (EMI®) is the best choice for international correspondence. For parcels, use the appropriate service. Visit **ups.com/international** to verify if your destination is eligible.

For the Letter rate, the parcel must be 11 inches or less in length, 6 inches or less in width, and 1/2 inch or less in thickness. For Express Envelopes weighing more than 10 oz., use the appropriate service.

Express Envelopes are not recommended for sensitive personal information or valuables. For these items, use the appropriate service.

This envelope is for use with the following services:

UPS Next Day Air®
UPS Worldwide Express®
UPS 2nd Day Air®

RETURN TO SHIPPER
ITKOWITZ PLLC
2128221808
26 BROADWAY
FL 21
NEW YORK NY 10004 1700
22/Mar/2016 11:35 1120-P019-8430
127121231293724684
NY 102 9-09
127121231293724684
RETURN TO SHIPPER
22/Mar/2016 11:35 1120-P019-8430
REASON FOR RETURN:
SUITE NUMBER NEEDED, NOT DELIVERED
ORIGINAL RECEIVER:
MIRIAM M. BERARDINO
NY 102 9-09
127121231293724684
UPS 3 DAY SELECT
TRACKING #: 12 712 123 12 9372 4684
3
BILLING: P/P
LVM3NPM NYMS289 US 1120 Mar 22 11:35:36 2016 H1P 18.3.9 LP2844
61172
US 18.0.33. WNTNV50 72.0A 01/2016

Window Envelope

Use this envelope with shipping documents printed from a laser or inkjet printer on plain paper.

Serving you for more than 100 years
United Parcel Service.



Shipping Notice - Carriage hereunder may be subject to the rules relating to liability and other terms and/or conditions established by the Convention for the Unification of Certain Rules Relating to International Carriage by Air (the "Warsaw Convention") and/or on the Contract for the International Carriage of Goods by Road (the "CMR Convention"). These commodities, technology or software were exported from the U.S. in accordance with the Export Administration Regulations. Diversion contrary to U.S. law prohibited.

EXHIBIT 4

UPS Internet Shipping: View/Print Label

1. **Ensure there are no other shipping or tracking labels attached to your package.** Select the Print button on the print dialog box that appears. Note: If your browser does not support this function select Print from the File menu to print the label.
2. **Fold the printed label at the solid line below.** Place the label in a UPS Shipping Pouch. If you do not have a pouch, affix the folded label using clear plastic shipping tape over the entire label.
3. **GETTING YOUR SHIPMENT TO UPS**
Customers with a Daily Pickup
Your driver will pickup your shipment(s) as usual.

Customers without a Daily Pickup

Take your package to any location of The UPS Store®, UPS Access Point(TM) location, UPS Drop Box, UPS Customer Center, UPS Alliances (Office Depot® or Staples®) or Authorized Shipping Outlet near you. Items sent via UPS Return Services(SM) (including via Ground) are also accepted at Drop Boxes. To find the location nearest you, please visit the 'Find Locations' Quick link at ups.com. Schedule a same day or future day Pickup to have a UPS driver pickup all of your Internet Shipping packages.

Hand the package to any UPS driver in your area.

UPS Access Point™
THE UPS STORE
64 BEAVER ST
NEW YORK ,NY 10004

UPS Access Point™
THE UPS STORE
71 BROADWAY
NEW YORK ,NY 10006

UPS Access Point™
THE UPS STORE
82 NASSAU ST
NEW YORK ,NY 10038

FOLD HERE

MICHELLE MARATTO 212 822 1808 ITKOWITZ PLLC 26 BROADWAY 21ST FLOOR NEW YORK NY 10004		0.6 LBS LTR		1 OF 1	
SHIP TO: KATHERINE G. RODI 2ND FLOOR 65 COURT STREET BROOKLYN NY 11201-4916					
		NY 111 9-50 			
UPS NEXT DAY AIR		1			
TRACKING #: 1Z 712 123 01 9602 9147					
BILLING: P/P					
Reference# 1: 61172					
		UIS 18 1 09 WNTNV50 72 0A 01/2016			

EXHIBIT 5

Allen Kohn

From: Allen Kohn
Sent: Tuesday, April 12, 2016 12:38 PM
To: 'kconnoll@law.nyc.gov'
Cc: Jay B Itkowitz
Subject: 61172 Richardson v. Dept of Education et al. 1:16-cv-01364

Kevin,

As discussed last week. We are requesting that you provide us with the addresses of Candace R. McLaren and Anna Steel.

Please provide the requested information or contact me to discuss.

Best,
Allen

Allen Kohn
Associate
Itkowitz PLLC
26 Broadway, 21st Floor
New York, New York 10004
P: (646) 822-1204
F: (212) 822-1401
akohn@itkowitz.com
<http://www.itkowitz.com>

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EXHIBIT 6

Allen Kohn

From: Connolly, Kevin (Law) <kconnoll@law.nyc.gov>
Sent: Tuesday, April 12, 2016 7:14 PM
To: Allen Kohn
Cc: Jay B Itkowitz
Subject: RE: 61172 Richardson v. Dept of Education et al. 1:16-cv-01364

Follow Up Flag: FollowUp
Flag Status: Completed

Allen,

I can accept service on behalf of Ms. McLaren and Ms. Steel. I will submit a letter to the court requesting an extension of the time to respond to the complaint for each of the individual defendant to 5/23 (the same date that was provided to DOE and the City). Do I have your consent for this request?

Kevin Connolly
Assistant Corporation Counsel
New York City Law Department | Labor & Employment Law Division
100 Church Street | New York, N.Y. 10007
Tel: (212) 356-1180
kconnoll@law.nyc.gov

From: Allen Kohn [<mailto:akohn@itkowitz.com>]
Sent: Tuesday, April 12, 2016 12:38 PM
To: Connolly, Kevin (Law)
Cc: Jay B Itkowitz
Subject: 61172 Richardson v. Dept of Education et al. 1:16-cv-01364

Kevin,

As discussed last week. We are requesting that you provide us with the addresses of Candace R. McLaren and Anna Steel.

Please provide the requested information or contact me to discuss.

Best,
Allen

Allen Kohn
Associate
Itkowitz PLLC
26 Broadway, 21st Floor
New York, New York 10004
P: (646) 822-1204
F: (212) 822-1401

EXHIBIT 7

Visit ups.com® or call 1-800-PICK-UPS® (1-800-742-5877) to schedule a pickup or find a drop off location near you.

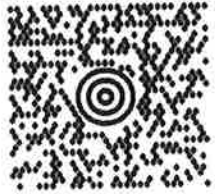
Domestic Shipments

To qualify for the 1st day rate, the package must be shipped by 11:30 AM on the day of shipment.

RETURN TO:
ITKOWITZ PLLC
2128221808
26 BROADWAY
FL 21

14/Apr/2016 11:36 1120-P020-1607

NEW YORK NY 10004 1700



NY 102 9-09



127121231296029144

RETURN TO SHIPPER
REASON FOR RETURN:
SUITE NUMBER NEEDED, NOT DELIVERED
ORIGINAL RECEIVER:
KATHERINE G. RODI

14/Apr/2016 11:36 1120-P020-1607



NY 102 9-09



127121231296029144

UPS 3 DAY SELECT

TRACKING #: 1Z 712 123 12 9602 9144

3



LVN3NPM NYMAS289 US 1120 Apr 14 11:36:01 2016 HIP 16.3.5 LP2844

This envelope is for use with the following services:

UPS Next Day Air®
UPS Worldwide Express®
UPS 2nd Day Air®

Insert shipping documents
under window from the top.

is envelope for:

ms/a.19
lect
Je Expedite®

4/6/2016 1:19 PM

United Parcel Service.

